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*Attorneys for Plaintiffs*  
**Andrea S. Sanders**  
**Marshall C. Sanders**

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

ANDREA S. SANDERS, an individual,  
MARSHALL C. SANDERS, an  
individual,

Plaintiffs,

v.

LOANCARE, LLC, a Virginia limited  
liability company; and DOES 1-50,  
inclusive,

Defendants.

CASE NO.: 2:18-CV-09376-PA (RAOx)

*Assigned to the Honorable Percy Anderson*

**PLAINTIFFS' NOTICE OF UNOPPOSED  
MOTION AND UNOPPOSED MOTION  
FOR AN AWARD OF CLASS  
REPRESENTATIVES INCENTIVE  
PAYMENT AND ATTORNEYS' FEES  
AND COSTS**

Date: November 16, 2020  
Time: 10:00 a.m.  
Courtroom: 9A

First Removal Notice: November 2, 2018  
Amended Removal: November 12, 2018  
FAC Filed on: April 2, 2019  
SAC Filed on: April 14, 2020

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on November 16, 2020, or as soon thereafter as  
3 the matter can be heard, in Courtroom 9A of the United States Courthouse located at  
4 350 W. 1st Street, 6th Floor, Los Angeles, CA 90012, Class Representatives Andrea S.  
5 Sanders and Marshall C. Sanders (“Class Representatives”), and Class Counsel  
6 Zimmerman Reed, LLP and Gubernick Law, P.L.L.C. (together, “Class Counsel”) will  
7 and hereby do move for an Order, consistent with the terms of the Class Action  
8 Settlement in this case, awarding: (a) a Service Award of \$7,500 to the Named  
9 Plaintiffs and Class Representatives; and (b) Class Counsel’s attorneys’ fees and costs  
10 in the amount of \$880,688.71.

11 This motion is based on this Notice of Motion and Motion, the accompanying  
12 Memorandum of Points and Authorities, the Declarations of Christopher P. Ridout and  
13 Benjamin Gubernick, the Class Action Amended Settlement Agreement (the  
14 “Settlement”) previously filed with the Court (Dkt. 82-1.), and all papers filed in  
15 support thereof, the Court’s Order dated March 24, 2020 granting Plaintiff’s Unopposed  
16 Renewed Motion for Class Certification and Preliminary Approval of Settlement  
17 Agreement (Dkt. 88.), the argument of counsel at the hearing of this Motion, all papers  
18 and records on file in the matter, and such other matters as the Court may consider.

19 Respectfully submitted,

20 ZIMMERMAN REED LLP

21 Date: October 19, 2020

By: /s/ Christopher P. Ridout  
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